

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

TIMOTHY L. KING,

Plaintiff,

v.

TRUIST BANK,

Defendant.

CIVIL ACTION FILE NO.:  
1:23-cv-95-JCF

**CONSENT MOTION FOR EXTENSION OF THE  
DISCOVERY PERIOD AND RELATED DEADLINES**

Defendant Truist Bank, with the consent of Plaintiff Timothy L. King, respectfully files this Consent Motion for a 90-day extension of the Discovery Period and all related discovery deadlines.

In support of this Consent Motion, Defendant states as follows:

1. On February 13, 2023, the Court issued a Scheduling Order assigning this case to a four-month discovery track (ECF No. 9). Discovery is currently set to close on June 16, 2023.

2. On February 28, 2023, counsel for Plaintiff appeared. (ECF No. 15.) Plaintiff had previously appeared *pro se*.

3. Following the appearance of counsel for Plaintiff, the Parties exchanged documents in order to discuss an early resolution. The Parties, however, require additional time to determine if settlement negotiations will be productive.

4. To allow the Parties time to continue early settlement discussions prior to discovery deadlines and the retention of experts, the Parties respectfully request a 90-day extension of the Discovery Period and all related deadlines.

5. This is the first request for an extension of the Discovery Period.

6. Plaintiff consents to this 90-day extension.

Wherefore, Defendant respectfully asks this Court to grant this Consent Motion and extend the Discovery Period by 90 days, up to and including September 14, 2023, and extend all discovery deadlines calculated backwards from the close of the Discovery Period.

Respectfully submitted, this the 17th day of May, 2023.

**Consented To:**

/s/ Chuck Michael Douglas

Chuck Michael Douglas  
Harold L. Johnson  
Wakhisi- Douglas, LLC  
1055 Howell Mill Road  
Suite 800  
Atlanta, GA 30318  
404-566-2320  
[cmdouglas@wd-law.net](mailto:cmdouglas@wd-law.net)  
[hljohnson@wd-law.net](mailto:hljohnson@wd-law.net)

**COUNSEL FOR PLAINTIFF**

**By:**

/s/ M. Laughlin Allen

M. Laughlin Allen  
Georgia Bar No. 901999  
McGuireWoods LLP  
1230 Peachtree Street, N.E.  
Suite 2100  
Atlanta, GA 30309  
Tel: (404) 443-5500  
Fax: (404) 443-5773  
[mlallen@mcguirewoods.com](mailto:mlallen@mcguirewoods.com)

Katherine E. Lehn  
(admitted pro hac vice)  
McGuireWoods LLP  
800 East Canal Street  
Richmond, VA 23219  
Tel.: (804)775-1000  
Fax: (804)775-1061  
[klehnen@mcguirewoods.com](mailto:klehnen@mcguirewoods.com)

**COUNSEL FOR DEFENDANT**

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**CERTIFICATE OF SERVICE AND  
COMPLIANCE WITH LOCAL RULE 5.1**

I hereby certify that the foregoing *Consent Motion for Extension of the Discovery Period and Related Deadlines* was filed with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorneys of record:

Chuck Michael Douglas  
Harold L. Johnson  
Wakhisi- Douglas, LLC  
1055 Howell Mill Road  
Suite 800  
Atlanta, GA 30318  
404-566-2320  
[cmdouglas@wd-law.net](mailto:cmdouglas@wd-law.net)  
[hljohnson@wd-law.net](mailto:hljohnson@wd-law.net)

I further certify that I prepared this document in 13-point Century

Schoolbook font and complied with the margin and type requirements of this Court.

This 17th day of May 2023.

/s/ M. Laughlin Allen

M. Laughlin Allen

Georgia Bar No. 901999

McGuireWoods LLP

1230 Peachtree Street, N.E.

Suite 2100

Atlanta, GA 30309

Tel: (404) 443-5500

Fax: (404) 443-5773

[mlallen@mcguirewoods.com](mailto:mlallen@mcguirewoods.com)

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